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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

IN RE: UBER TECHNOLOGIES, INC.,
PASSENGER SEXUAL ASSAULT
LITIGATION

Case No. 3:23-md-03084-CRB
**STIPULATION REGARDING
PRODUCTION OF HYPERLINK
METADATA OVERLAYS**

This Document Relates to:

ALL ACTIONS

Judge: Hon. Lisa J. Cisneros
Courtroom: G – 15th Floor

Pursuant to Dkt. No. 2470, Plaintiffs and Defendants Uber Technologies, Inc., Rasier, LLC, and Rasier-CA, LLC (collectively, “Defendants”) (jointly, “the parties”), respectfully submit this Joint Stipulation.

Defendants represent that, to the best of their knowledge, “the February metadata overlay consisted of family relationship information that could not have been included when documents were originally produced.” *See* Dkt. No. 2470.

With respect to “the schedule for production of overlays providing such family relationship information going forward,” *see* Dkt. No. 2470:

1. Defendants agree to produce overlays providing such hyperlink-related metadata on a twice monthly basis going forward until such overlays are no longer required.
2. Defendants agree to limit those overlays to documents receiving updated hyperlink metadata.
3. Defendants agree to provide cover letters for those overlays stating that, to the best of

1 their knowledge, the overlay consists of hyperlink-related metadata that could not have been included
2 when documents were originally produced or at the time of the previous overlay production.
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ATTESTATION

Pursuant to Civil Local Rule 5-1(h)(3), I hereby attest that all signatories listed, and on whose behalf the filing is submitted, concur in the filing's consent and have authorized the filing.

Dated: March 14, 2025

By: /s/ Rachel B. Abrams

CERTIFICATE OF SERVICE

I hereby certify that on March 14, 2025, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system, which will automatically send notification of the filing to all counsel of record.

By: /s/ Rachel B. Abrams